

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

REGINA GORAM,)	Civil Action No.
)	3:06-cv-323-WKW
Plaintiff,)	
)	
v.)	
)	
MEADOWCRAFT, INC.,)	
)	
Defendant.)	

**JOINT MOTION FOR ENTRY OF STIPULATED JUDGMENT AND
ORDER OF DISMISSAL WITH PREJUDICE**

Pursuant to this Court's Order of January 23, 2007 (Doc. # 21), Plaintiff Regina Goram and Defendant, Meadowcraft, Inc. ("Meadowcraft") jointly move the Court to approve the parties' settlement and to enter the attached Stipulated Judgment and Order of Dismissal With Prejudice (Exhibit "A"). As grounds for the motion, the parties say as follows:

This case includes claims under the Fair Labor Standards Act by Plaintiff against Defendant Meadowcraft.

The parties have reached an agreement to resolve all claims in this case. Given that this case involves claims under the FLSA, the parties respectfully seek Court approval of the settlement and the entry of a stipulated judgment and an

order of dismissal with prejudice. The parties have exchanged and executed a Settlement Agreement and Release, an executed copy of which will be filed *under seal* as Exhibit “B” to this Joint Motion. The pleadings and Settlement Agreement and Release reflect that a bona fide dispute of both law and fact is involved in this litigation, including, but not limited to, disputes as to coverage, liability, and facts. The parties believe that the settlement reflected in the Settlement Agreement and Release is fair and equitable to all parties involved.

Therefore, the parties move the Court to approve the settlement by entering the Stipulated Judgment and Order of dismissal with prejudice.

Submitted this 16th day of February, 2007.

s/ Maury Weiner
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Maury Weiner
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EXHIBIT A

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)	
Plaintiff,)	3:06-cv-323-WKW
)	
v.)	
)	
MEADOWCRAFT, INC.,)	
)	
Defendant.)	

**STIPULATED JUDGMENT AND ORDER OF DISMISSAL WITH
PREJUDICE**

This case involves claims under the Fair Labor Standards Act brought by Plaintiff Regina Goram ("Plaintiff") against Defendant Meadowcraft, Inc. ("Meadowcraft").

The parties have informed this Court that they have reached an agreement to resolve all claims. The parties have advised the Court as to the terms of the agreement and the Court has reviewed, *in camera*, copies of the confidential Settlement Agreement and Release submitted under seal. The parties have jointly requested that this Court approve the settlement, enter this stipulated judgment and dismiss this case with prejudice.

Following an examination of the pleadings and Settlement Agreement and Release, this Court finds that a bona fide dispute of both law and fact is involved in this litigation, including, but not limited to, disputes as to coverage, liability, and

facts. Having reviewed the Settlement Agreement and Release agreed upon by the parties, this Court finds that the Settlement Agreement and Release proposed by the parties is fair and equitable to all parties involved. Therefore, the parties are hereby ordered to finalize the settlement through the exchange of consideration. Based upon this resolution by the parties, all claims plaintiff has or may have had arising out of or relating to this lawsuit, including, but not limited to, any claims under the Fair Labor Standards Act for wages, overtime, liquidated damages, attorney's fees, costs, expenses or other relief, award or damages are hereby resolved and dismissed with prejudice.

This case is hereby dismissed with prejudice. Each party is to bear its own costs, fees and expenses except as otherwise provided for in the Settlement Agreement and Release between the parties.

UNITED STATES DISTRICT JUDGE